

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JUNE CULROSS

Plaintiff,

v.

FALLON CLINIC, INC. and
MARLENE DODGE

Defendants.

C. A. No. 05-40092FDS

**ASSENTED TO JOINT MOTION TO EXTEND THE TIME FOR DEFENDANTS TO
FILE A RESPONSIVE PLEADING TO PLAINTIFF'S COMPLAINT**

The Parties hereby submit this Joint Motion To Extend The Time For Defendants To File A Responsive Pleading to Plaintiff's Complaint ("Joint Motion"). In support of this Joint Motion, the parties state as follows:

1. By this action, the Plaintiff alleges that Defendants violated the Family Medical and Leave Act ("FMLA") and M.G.L. c. 151B. Specifically, Plaintiff alleges that Defendants interfered with the exercise of her rights pursuant to the FMLA and discriminated against her on the basis of her alleged handicap.

2. Presently, the deadline for filing a responsive pleading to Plaintiff's Complaint is August 30, 2005.

3. Since receiving Complaint, counsel for the Parties has had ongoing discussions regarding the possibility of settling the case.

4. Unfortunately, summer vacations and other matters have prevented the Parties from proceeding as quickly as originally anticipated with regard to the settlement negotiation.

5. Currently, the attorneys are very actively exploring the possibility and parameters, of a possible settlement. The Parties anticipate determining very soon whether settlement is possible.

6. Because the Parties intend to engage in good faith settlement negotiations, and because they also wish to avoid unnecessary time and expense related to this matter, the Parties have agreed that Defendants need not file a responsive pleading until settlement negotiations have been pursued more fully.

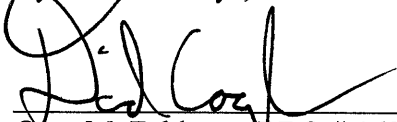
7. Accordingly, the Parties request that the deadline for submission of a responsive pleading be extended to September 30, 2005.

8. The Parties will not be prejudiced by this extension.

WHEREFORE, the Parties respectfully request that the Court extend the time for Defendants to file a responsive pleading to September 30, 2005.

FALLON CLINIC, INC. and
MARLENE DODGE

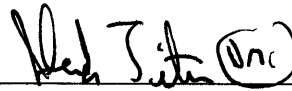
By their attorneys,



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JUNE CULROSS

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Dated: August 30, 2005